

**PSJ14 Janssen Opp Exh 42 – Cartwright Dep (dep not cited in
appendices)**

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

5 IN RE: NATIONAL : HON. DAN A.
6 PRESCRIPTION OPIATE : POLSTER
7 LITIGATION : MDL NO. 2804
8 APPLIES TO ALL CASES : NO. 1:17-MD-2804

10 HIGHLY CONFIDENTIAL

11 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

14 January, 17, 2019

17 Videotaped deposition of CARLA CARTWRIGHT,
18 taken pursuant to notice, held at the law offices of
19 O'Melveny & Myers, LLP, 1625 Eye Street, N.W.,
20 Washington, D.C., beginning at 9:14 a.m., before
21 Misty Klapper, Registered Merit Reporter, Certified
22 Realtime Reporter and Notary Public in and for the
23 District of Columbia.

1 Healthcare Organizations. And I -- this is
2 the -- I assume the organization you were
3 trying to refer to earlier?

4 A. It is.

5 Q. And informally I'm going to
6 refer to this organization as JCAHO.

7 A. I will do the same.

8 Q. That's -- that's perfect. Yeah.
9 I just wanted to make sure you understood what
10 I was referring to.

11 A. Um-hmm (affirmative).

12 Q. What is JCAHO?

13 A. So it's an accreditation
14 organization for, you know, all kinds of
15 hospitals, and they provide guidelines and
16 best practices in addition.

17 Q. Has J&J participated in any
18 lobbying efforts or governmental affairs
19 activities related to JCAHO's pain standards
20 for hospital accreditation?

21 A. So it's my understanding that we
22 received a request from them to help support
23 development of the monograph and that we did
24 so.

1 Q . And when was this request
2 received?

3 A . I believe -- you know , at this
4 moment it's not coming to me. I'll let you
5 know if I can pull it up -

6 Q . Okay.

7 A . -- that date .

8 Q . Are there -- who were the
9 individuals involved with this effort?

10 A . They were individuals from our
11 medical affairs group .

12 Q . Do you know the names of any
13 Janssen employees specifically?

14 A . I believe Bruce M oskovitz and
15 Gary Vorsanger may have been involved in this
16 as well

17 Q . Okay. You said it was a -- a
18 request to support the development of a
19 monograph .

20 Did that monograph have a title
21 or a name ?

22 A . I don't know the specific title .
23 I believe there was an initial monograph and
24 then a few years later -- a follow-on .

1 Q . Okay. And what specifically did
2 that monograph address?

3 A . I—I think it was related to
4 pain management specifically.

5 Q . I understand you didn't—you
6 don't remember the date.

7 Is this a recent effort or was
8 this earlier?

9 A . I—I'm thinking early 2000s —

10 Q . Okay.

11 A . —but don't recall the exact
12 year.

13 Q . It predicated your piping J&J,
14 though; is that correct?

15 A . Yes.

16 Q . Okay.

17 A . That's my understanding.

18 Q . We're going to —

19 M R .ACKERMAN : Do we have a
20 stapler in here?

21 M R .GALIN : There's probably one
22 in the back left corner of that.

23 M R .ACKERMAN : So there are a
24 set of documents that were produced by Janssen

1 as a family, and I want to make sure I keep
2 them together, hopefully in the right order,
3 so —

4 MR . GALIN : It seems like
5 there's a political joke to be made here.

6 MR . ACKERMAN : We will mark that
7 as the next exhibit.

8 (Thereupon, J&J-Cartwright
9 Deposition Exhibit Number 8 was marked
10 for identification.)

11 THE WITNESS : Thank you.

12 BY MR . ACKERMAN :

13 Q . Ms. Cartwright, the court
14 reporter has handed you what is marked as
15 Exhibit Number 8. It is a multipage document
16 with Bates numbers JAN-M S -00654707 through
17 -711. I'll note that two of the documents
18 that were attachments to this E-mail were
19 produced to us in native form, and so we've
20 included the slip sheet and the native files
21 in this document.

22 Take a moment to review the
23 document. Let me know when you've had a
24 chance to review it.

1 M R .ACKERM AN : Counsel, I would
2 note that the page at 654708 is noted to be
3 withheld as not responsive. I don't know
4 whether that's because it was -- I -- I don't
5 know why that is, but I'd ask you to look into
6 that.

7 M R .GALIN : I don't know why
8 that is either, but I will look into it as
9 well.

10 M R .ACKERM AN : Okay. Thank you.

11 M R .GALIN : I'm just not -- I
12 just want to make sure I'm -- oh, okay.

13 BY M R .ACKERM AN :

14 Q . Have you reviewed it?

15 A . At high level, yes.

16 Q . Okay. Sure.

17 Have you seen this document
18 before?

19 A . I believe I've seen parts of
20 this document.

21 Q . Okay. Which parts of the
22 document have you seen?

23 A . I believe I've seen the last
24 page, 654711.

1 Q . Okay. Is this – if you turn
2 back to the ~~first~~page, the subject matter of
3 this E -m ail says, JCAHO pain management, Jean
4 Gillespie.

5 Is this E -m ail referring to the
6 pain management project that you testified to
7 earlier?

8 A . I believe so, yes.

9 Q . Okay. And the E -m ail says or
10 appears to ask Gary Vorsanger to take the lead
11 on the project.

12 Did – did Gary Vorsanger, in
13 fact, take the lead on this – this project?

14 A . I believe that's the case.

15 Q . Okay. Did Janssen provide any
16 financial support to JCAHO in connection with
17 the drafting or promotion of its pain
18 management standards?

19 A . It's my understanding that we
20 did provide funding.

21 Q . Okay. When?

22 A . So in preparing, I think it was
23 a little difficult for us to determine exactly
24 when and – and over what time period, but I

1 believe in the early 2000s.

2 Q. Okay. And approximate – or do
3 you know how much funding was provided?

4 A. I believe it was 50,000, but I'm
5 not sure if that was just – just that or –
6 or maybe there was another time period
7 involved, too.

8 Q. Okay. Was the 50,000 in a
9 single payment or in multiple payments?

10 A. That I do not know.

11 Q. Okay. Do you know – okay.

12 Other than Mr. Moshkovitz and
13 Mr. Vorsanger, was anyone else at J&J involved
14 in this JCAHO pain management effort?

15 A. I believe some others who, you
16 know, might have reported to them or been –
17 you know, others in – in medical affairs may
18 have had some involvement, you know,
19 providing scientific input.

20 Q. Okay. Specifically, do you know
21 who?

22 A. I do not.

23 Q. Alright. Why did J&J become
24 involved in increasing awareness of the JCAHO

1 guidelines in pain – pain management?
2 A. Well, I believe that we feel
3 like it's important to ensure that people who
4 are suffering from pain have adequate access
5 to appropriate treatments and that education
6 is – is a – you know, a good thing in –
7 in – in the different product areas and
8 disease areas where we work.

9 And so it would not be, you
10 know, atypical for us to provide funding or,
11 you know, want to have a seat at the table
12 when something like this was sort of being
13 discussed and – and proposed.

14 Q. When you say adequate access to
15 appropriate treatments, does that include the
16 prescribing of Janssen – or J&J's opioid
17 products?

18 A. Well, it could, depending on the
19 decision of the appropriate, you know, medical
20 professional.

21 Q. Okay. Did the JCAHO guidelines
22 in pain management – strike that. Okay.

23 Let's move on to the next topic,
24 which is 25(f). And this is lobbying efforts